

Exhibit B-3

**Excerpts from the Deposition of Keisha Jones, dated January 10, 2013,
Pages 192-283**

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2 your police report in 2006?

3 A. It is not in this package.

4 Q. Are there other documents other
5 than those that appear in this package that you
6 provided to your attorney?

7 MR. MALLON: Objection to form.

8 A. It is not here. The receipts, the
9 three receipts showing the security freeze
10 mailings, it is not in this package, maybe it is
11 in the other.12 Q. Do you have other documents
13 concerning this litigation other than those that
14 are appearing in the package identified as
15 Exhibit 10?16 A. Everything that -- I have submitted
17 everything to date, so.18 Q. Have you submitted anything other
19 than what is contained in this packet?20 MR. MALLON: Objection, form. The
21 documents were submitted by her attorney.

22 You can answer.

23 A. There are other documents. This is
24 concerning Equifax and Experian, there were
25 documents for Trans Union. I don't know which

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2 package it is in, but the receipts regarding the
3 security freeze I did submit copies of that.4 MR. STRAZZERI: Let the record
5 reflect these are the only documents that we
6 received from Plaintiff produce in this
7 action. To the extent --8 MR. MALLON: That is totally untrue.
9 We have given you way more documents. Are
10 you kidding.11 MR. STRAZZERI: Let's go off the
12 record and figure out which other ones. This
13 is all that I received.14 THE VIDEOGRAPHER: We are going off
15 the record at 2:53 p.m.

16 (Recess taken.)

17 THE VIDEOGRAPHER: We are back on the
18 record at 2:55 p.m.19 MR. STRAZZERI: We are going to
20 proceed with the questioning regarding these
21 documents, though it appears that Plaintiff's
22 counsel never disclosed these documents to
23 Experian as opposed to some other Defendants.24 MR. MALLON: We disagree with that,
25 but go ahead.

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2 BY MR. STRAZZERI:

3 Q. Miss Jones, identify whatever
4 documents you provided to your attorney in this
5 lawsuit other than those that appear in this
6 packet?7 A. There is a similar document that is
8 documents from my file concerning Trans Union.

9 Q. What is in that packet?

10 A. Information regarding Trans Union.

11 Q. Is there any information in there
12 concerning Experian?13 A. It may be. Some information is
14 cross-referenced, yes.15 MR. STRAZZERI: To the extent that we
16 didn't get these documents I reserve our
17 right to question Miss Jones on those if they
18 are relevant to my client.19 Q. What documents in that production
20 concern your Experian credit file or identity
21 theft?

22 MR. MALLON: Objection, form.

23 Q. Let's take one step at a time.
24 Which documents in that packet concern your
25 Experian credit file?

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2 MR. MALLON: When you say that

3 packet, you're talking about Jones Exhibit 10?

4 MR. STRAZZERI: No. Let me clarify

5 if it is not clear.

6 Q. The question is, what documents in
7 your production to Trans Union concern Experian?

8 MR. MALLON: Objection to form.

9 A. It may be in that particular
10 package where I submitted the copies of the
11 mailings regarding the security freeze.

12 Q. Describe those documents?

13 A. It is the signature -- the priority
14 mail confirmation receipts that you get at the
15 post office when you mail something and they are
16 pink.

17 Q. When are they dated?

18 A. They are pink and they are dated
19 November, 2006.20 Q. And they are just the receipts
21 alone, they don't indicate what was sent along
22 within that package?23 A. No. Just the receipts showing they
24 went to the three credit bureaus security freeze
25 department on the day of or shortly after the

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2 Security Freeze Law went into effect in 2006.

3 Q. Do you have a copy of the letter
4 that you sent?5 A. No. I have those receipts and I
6 have acknowledgment back regarding the security
7 freeze that it was placed, which was submitted.8 (Jones Exhibit 11 for identification,
9 Documents that Experian produced in this
10 action.)11 Q. I show you what is marked as
12 Exhibit 11?13 MR. MALLON: Can we go off the record
14 for a second?

15 MR. STRAZZERI: Yes.

16 THE VIDEOGRAPHER: We are going off
17 the record at 2:58 p.m.

18 (Recess Taken.)

19 THE VIDEOGRAPHER: We are back on the
20 record at 2:59 p.m.

21 BY MR. STRAZZERI:

22 Q. I hand you what is marked as
23 Exhibit 11. These are documents that Experian
24 produced in this action.

25 MR. MALLON: A partial amount of the

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2 documents.

3 MR. STRAZZERI: These are documents,
4 not the extent of them. Experian produced
5 over a thousand pages.6 Q. What is the last Bates number in
7 that packet?

8 A. 15.

9 Q. Does that package of correspondence
10 include the document you sent Experian, the letter
11 that you sent Experian that you described a moment
12 ago?13 A. This information from Experian
14 looks like it goes from 2007 to 2011.15 Q. Let's take a look at the page that
16 is Bates labeled Experian 8.

17 A. Yes.

18 Q. Is this the letter -- is this a
19 letter that you sent to Experian in November -- on
20 November 18, 2011?

21 A. Yes.

22 Q. It is here that you're requesting --
23 describe this letter?24 A. I wrote this letter requesting how
25 Experian goes about investigating fraud.

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2 Q. Did you send any documents along
3 with this letter?4 A. It looks like this is just the
5 one-page letter.6 Q. Did you send any other documents to
7 Experian in November, 2011 other than the letter
8 identified at Experian 0008?

9 A. Yes, Experian 0011.

10 Q. Describe that letter?

11 A. That letter is December 12th, 2011
12 and I proceeded to ask questions about the report
13 indicated there. Because I didn't understand it.14 Q. Did you enclose any documents with
15 the letter?16 A. I did not. I referenced the
17 Experian report which Experian has.18 Q. Did you send any other letters or
19 correspondence or materials to Experian in 2011
20 other than what is marked Experian 005, Experian
21 008 and Experian 0011?22 A. Experian 0013 dated December 20th,
23 2011 where I'm asking, again, for my consumer
24 statement to be added verbatim, which was not.

25 Q. Did you send any enclosures or

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2 materials along with this letter?

3 A. I do not believe I sent an
4 enclosure. It looks like it may just be the one
5 page requesting for the second or maybe third time
6 that my consumer statement be added. My 100-word
7 consumer statement.8 Q. Have you ever sent any documents to
9 Experian or letters to Experian other than what is
10 contained in this Exhibit 11?

11 A. I believe I have.

12 Q. What is your basis?

13 A. My basis that this has been going
14 on now year eight, so I'm pretty sure that I have
15 sent other letters, but I may not have them all.
16 I can't find every single thing. I believe I have
17 sent other letters.18 Q. Do you have any recollection of
19 sending any letters other than those that appear
20 in Exhibit 11?21 A. I believe I may have. I may not
22 have kept a copy.23 Q. I'm not asking what you believe or
24 assume or think. I'm asking you what you recall.

25 Do you recall sending any letters

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2 or materials to Experian other than those that are
3 contained in Exhibit 11?4 A. I believe ever over the years, I
5 have, yes.6 Q. What recollection, if any,
7 regarding other letters or materials that you sent
8 to Experian?

9 A. I'm sorry?

10 Q. What is the basis for your
11 statement that you believe you sent other
12 materials or letters?13 A. Because I have been disputing fraud
14 for quite a few years now.15 Q. Do you have any recollection, any
16 specific recollection of sending any other letter
17 or materials to Experian other than what is marked
18 as Exhibit 11?19 MR. MALLON: Objection, she already
20 testified about other things that she sent.

21 A. I believe I may have, yes.

22 Q. I'm not asking what you believe you
23 may have done.

24 A. So what's your definition?

25 Q. My question is whether you have a

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2 recollection, if you recall sitting here today at
3 this table ever sending a specific document or
4 letter or materials to Experian other than what is
5 contained in Exhibit 11?

6 MR. MALLON: Same objection.

7 A. I believe so, yes.

8 Q. What actual recollection do you
9 have? Not assumptions or anything else, but what
10 actual recollection do you have of sending other
11 materials to Experian?

12 A. I sent materials to put my security
13 freeze on and as I said, I have been disputing
14 fraud for several years, so I may have sent other
15 letters regarding fraud.

16 Q. You may have sent or you recall
17 sending?

18 A. I may have sent other letters
19 regarding fraud. I certainly sent documentation
20 regarding the security freeze.

21 Q. Testify as to all facts regarding
22 other letters or correspondence that you have sent
23 to Experian other than those in Exhibit 11?

24 MR. MALLON: Objection, asked and
25 answered.

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2 A. I believe over the years since 2005
3 to present which is now eight years I believe I
4 sent other letters and documentation to Experian,
5 one of which is regarding my security freeze that
6 I sent in 2006.

7 Q. What are the facts that you recall
8 regarding each of those letters? How many other
9 letters?

10 A. Minimum of three. Sorry, not to
11 Experian. The security freeze is to all three
12 credit bureaus, those are three letters but not
13 all to Experian.

14 Q. Let's focus on letters that you
15 sent to Experian. Give me all the facts regarding
16 each specific letter or correspondence that you
17 sent Experian other than those contained in
18 Exhibit 11?

19 A. In 2006 I sent Experian
20 documentation for my security freeze and with
21 regard to identity theft.

22 Q. What did you send?

23 A. I sent whatever documentation at
24 the time was necessary to get my security freeze
25 on my account and to make sure it is notated that

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2 I'm a victim of identity theft.

3 Q. What do you recall sending?

4 A. I recall sending either -- I don't
5 know if it was a form or cover letter, but I don't
6 recall if it was a form that the state required
7 you to send along with the police report. And I
8 have my receipts that I sent it to the security
9 freeze department and it was obviously done.

10 Which I don't see here.

11 Q. You don't remember if it was a form
12 or cover letter that you sent?

13 A. I'm not sure.

14 Q. Do you remember actually seeing the
15 materials? Can you recall what you sent?16 A. As I said, it was either a form or
17 a letter. I'm not sure at the time what was
18 called for. But I sent whatever I needed to send
19 at the time.

20 Q. When did you send it?

21 A. November, 2006.

22 Q. It was just one time?

23 A. For the security freeze, yes.

24 Q. Other than that instant that you
25 just described in November of 2006, have you sent

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2 Experian any other letters or correspondence other
3 than those that are contained in Exhibit 11?

4 A. I believe so.

5 Q. Are you basing your belief on
6 specific recollection or just an assumption?7 A. I believe so because I have been
8 disputing fraud for several years now.9 Q. So you're drawing that assumption
10 based on the fact that you have been disputing it?11 MR. MALLON: Objection, asked and
12 answered. Misstates testimony. Go ahead.

13 A. I believe I sent other documents.

14 Q. Do you have any recollection of
15 sending other documents?

16 A. I believe so, yes.

17 Q. What is your recollection?

18 MR. MALLON: Objection, you have ask
19 the same question about five times.

20 MR. STRAZZERI: She is not answering.

21 MR. MALLON: Yes, she has.

22 MR. STRAZZERI: She is making
23 assumptions.24 MR. MALLON: She is answering it. If
25 you don't like the answer that is one thing.

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2 MR. STRAZZERI: I'm asking for her
3 recollection.4 MR. MALLON: I am going to instruct her
5 not to answer.6 MR. STRAZZERI: Instruct your client
7 to testify based on her recollection of
8 events not on her assumptions of what she
9 thinks she would have done based on the law
10 that was in place then. I'm asking for
11 specific recollection.12 MR. MALLON: He is asking if you
13 remember specifically sending certain things
14 in.15 A. Do you want to ask the question
16 again?17 Q. What do you have a specific
18 recollection of sending Experian other than the
19 documents contained in Exhibit 11?20 A. I remember sending the documents
21 that were necessary for my security freeze in
22 November of 2006.23 Q. What documents did you send
24 Experian?

25 A. I remember sending them, either it

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2 is either a cover letter or a form, I don't know
3 which one, along with the police report and I
4 don't know if there was anything else that needed
5 to go with that. I don't think there was anything
6 else that needed to go with that at the time.

7 Q. Do you have a copy of that?

8 A. I do not have a copy of the
9 contents. I just have a copy of the mailing and
10 the confirmation back stating that the security
11 freeze was placed.

12 Q. What do you mean when you say a
13 copy of the mailing?

14 A. The receipt that I mailed it at the
15 post office.

16 Q. Do you have a copy of anything else
17 with respect to that mailing, the package?

18 A. I don't -- I have not come across
19 it in my file. I have only came across the actual
20 receipt as well as the confirmation.

21 Q. Do you recall sending Experian any
22 other documents or materials other than what you
23 have just described you sent in November, 2006 and
24 the documents in Exhibit 11?

25 A. I recall sending Experian other

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2 letters over the years that is not included in
3 here, but I haven't come across the copies of
4 those.5 Q. Do you have copies of any other
6 letters that you sent to Experian other than those
7 in Exhibit 11?8 A. I have not run across any
9 additional other than what I gave today or that
10 has been printed and everything that I produced so
11 far.12 Q. Do you have any proof or evidence
13 indicating that you sent any other letters or
14 materials to Experian other than those in
15 Exhibit 11 and the receipts that you referenced in
16 November of 2006?

17 MR. MALLON: Objection to form.

18 A. What I -- everything that I
19 produced so far is what I have on hand so far.20 Q. Are there any receipts or anything
21 else with respect to these other mailings?22 A. I haven't seen any, but it is
23 possible that there could be.24 Q. Describe the other letters that you
25 contend that you sent to Experian that aren't

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2 contained in Exhibit 11?

3 MR. MALLON: Objection, asked and

4 answered. She answer this four times.

5 Q. Not what we already described. You
6 described one in November of 2006. You see that
7 there is several here in Exhibit 11. Describe any
8 other documents that you recall sending Experian?

9 MR. MALLON: Same objection.

10 A. I believe over the years I have
11 sent Experian documents with regard to consumer
12 statements as well as fraud.13 Q. What documents do you, specifically
14 sitting here today, recall sending Experian other
15 than what you just described in November, 2006 and
16 what is contained in Exhibit 11?

17 MR. MALLON: Same objection.

18 A. I have sent letters regarding
19 consumer statements.20 Q. The letter regarding consumer
21 statements there are some here in Exhibit 11.
22 What other documents other than those here and
23 November of '06 do you have a specific
24 recollection of sending Experian?

25 MR. MALLON: Same objection.

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2 A. Other than what is here, I believe
3 I sent letters with respect to the same issue.
4 Consumer statements and fraud.

5 Q. Do you have a specific recollection
6 of any of those letters?

7 A. Consumer statements, yes.

8 Q. When did you send it?

9 A. At some point between '05 and now.

10 Because this is not -- these documents with
11 respect to the consumer statement, this is not the
12 first time that I asked for a consumer statement.

13 Q. So you believe you sent another
14 letter concerning consumer statements sometime
15 between 2005 and the present?

16 A. Yes.

17 Q. Do you have any more details
18 regarding this alleged mailing other than what you
19 just stated?

20 A. It was another request for my
21 consumer statement to be added.

22 Q. Did it contain any other dispute or
23 issue?

24 A. If I understand your question
25 correctly, what is not here and what I recall

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2 sending Experian, which I don't have a copy of, if
3 I had it I would have produced it already, are
4 specific to adding my consumer statement and
5 disputes. Those are the two issues that have been
6 long-standing since '05.

7 Q. Before we can move off this area I
8 need to understand exactly your recollection of
9 other materials that you contend that you sent to
10 Experian.

11 You have identified a letter that
12 you contend that you sent in November of 2006 and
13 we have documents in Exhibit 11.

14 What I'm asking is for you to
15 identify what other letters you sent to Experian
16 other than those?

17 MR. MALLON: Objection. Asked and
18 answered many times.

19 A. I just -- you want me -- we could
20 read back what I just said. It is the same
21 answer.

22 Q. How many other letters were there?

23 A. I don't recall. I don't know how
24 many there were. But those were the -- those are
25 the two long-standing issues.

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2 Q. You don't know how many letters.

3 Do you know when you sent them?

4 A. I don't know the exact dates.

5 Q. Do you know where you sent them?

6 A. To whatever address Experian had at
7 the time.

8 Q. Do you have copies of any of them?

9 A. Not that I can put my hands on now,
10 but if I find them I will produce them.11 Q. You said they pertained to two
12 issues; is that right?13 A. Those are my two long-standing
14 issues, yes.15 Q. Those are disputes and your
16 statement?

17 A. Consumer statement.

18 Q. That consumer statement with
19 respect to the identity theft?20 A. That is my 100-word consumer
21 statement.22 Q. What disputes do those letters
23 pertain to?24 A. I don't have the letter in front of
25 me, so I couldn't tell you that. These have been

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2 my issues over the last eight years.

3 Q. Without those letters are you able
4 to testify what disputes you address in those
5 letters?6 A. Not until I find them or if I find
7 them.8 Q. Did you write Experian on any other
9 occasion regarding any issues other than your
10 consumer statement and what you recall just
11 generally as disputes?12 A. My issues have been around identity
13 theft, consumer statements, disputes, fraud.
14 Those have been my issues.15 Q. Did you ever send Experian a letter
16 specifically addressing Central Financial Control
17 or Hahnemann University Hospital?18 A. I don't recall -- I don't know if I
19 sent -- I may have sent a letter, I don't know
20 what is in that -- I don't know if one of those
21 letters is in there of what we -- what I produced
22 last night. So, I could take a quick look and I
23 will tell you that.24 (Jones Exhibit 12 for identification,
25 Documents produced day of deposition.)

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2 Q. I hand you now what is marked as
3 Exhibit 12. These are the documents that we
4 received from your attorney this afternoon?5 A. These are the same. We already
6 have them. Okay.7 Q. Did you ever send Experian any
8 letter or correspondence regarding the account
9 with Central Financial Control or Hahnemann
10 University Hospital?11 A. I don't recall mailing letters. My
12 disputes with regard to those Defendants have been
13 verbal by phone.14 Q. Have any of your letter
15 correspondence with Experian referenced a Comcast
16 Cable account?17 A. My verbal conversations with
18 Experian have involved Comcast, yes. My verbal
19 conversations. I don't recall writing a letter to
20 Experian about it, but I certainly wrote to
21 Comcast.22 Q. So you never wrote a letter or any
23 written correspondence to Experian concerning CFC,
24 Hahnemann or Comcast Cable?

25 A. My communication with Experian

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2 regarding those Defendants have been primarily by
3 phone and I have written letters to those
4 Defendants.

5 Q. Have you written to Experian
6 regarding those accounts?

7 A. My communication around that has
8 been with Experian by phone. I don't recall
9 mailing a letter specifically around those
10 Defendants, but I have disputed them repeatedly
11 before and during this litigation.

12 Q. Have you ever prepared or signed a
13 fraud affidavit?

14 A. What is that? If I had to write a
15 letter, if someone wanted me to write a letter
16 stating what happened, I have written a letter.
17 Is that what you're asking?

18 Q. What letter are you referring to?

19 A. With respect to getting the money
20 returned to my IRS account I had to write a letter
21 to get that money returned.

22 Q. Where was that letter sent?

23 A. I believe the bank that was
24 involved -- I believe it was HSBC, I believe.
25 Because the bank -- it was an electronic return

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2 filed through H&R Block and HSBC I believe was the
3 bank that actually either issued the refund --
4 somehow or another HSBC was involved, so they had
5 to -- they were responsible for making sure that
6 that exact amount -- that check that was cashed
7 went back to the IRS.

8 Q. Was this a statement that you made
9 under oath or you just had to write a letter to
10 HSBC?

11 A. I had to write a letter to HSBC and
12 I don't know where this letter is. I probably
13 still have it, but I can't find it. And they
14 wanted my signature as well because obviously they
15 had a copy of the canceled -- I believe they sent
16 a check, I don't know what they had, from the
17 identity thieves but I did have to send samples of
18 my signature.

19 Q. Have you ever prepared or signed
20 any statement under oath regarding your identity
21 theft?

22 A. Other than my complaints?

23 Q. Yes.

24 A. No, I don't recall doing that.

25 Q. Did you ever submit any sworn

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2 the issues that I mentioned. Identity theft --

3 MR. MALLON: I think the confusion

4 here is you can believe you did something

5 without having a specific recollection that

6 you actually did it. So that is sort of the

7 confusion that we are having here.

8 So testify truthfully, but what he is

9 asking is not whether you did it at all, but

10 whether or not you specifically remember

11 actually sending this certain type of letter

12 or not.

13 MR. STRAZZERI: Thank you, yes.

14 A. I think I did. I think I did. I

15 don't know what other answer you want from me on

16 that issue. Because I believe I did.

17 MR. KARAMOUZIS: Do you remember

18 whether you did it, that's the question.

19 MR. MALLON: You can believe that you

20 did, but you don't have any specific recollection

21 of sending a letter on a specific date.

22 A. I recall that I probably did have

23 to notarize -- I did, probably did send a

24 notarized letter to Experian because as I look at

25 that package here I see I sent a notarized letter

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2 to Equifax on a particular issue.

3 MR. STRAZZERI: Let's change the

4 videotape.

5 THE VIDEOGRAPHER: Going off the

6 record at 3:23 p.m. and this marks the end of

7 tape number three.

8 (Recess taken.)

9 THE VIDEOGRAPHER: We are back

10 on the record at 3:30 p.m. and this marks the

11 beginning of tape number four.

12 BY MR. STRAZZERI:

13 Q. Miss Jones, back to the point that
14 we were discussing earlier. Do you have any
15 specific recollection of ever sending Experian any
16 notarized documents?

17 A. I don't recall.

18 Q. Do you have any specific
19 recollection of sending Experian anything other
20 than the exhibits in exhibit -- the letter in
21 Exhibit 11 and the documents that you described
22 before in November of 2006?

23 MR. MALLON: Objection, asked and

24 answered.

25 A. Any documents other than what is

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2 here in Experian's package and my security freeze
3 information from 2006, aside from that you're
4 saying?

5 Q. Yes.

6 A. I don't recall.

7 Q. You referenced contacting Experian
8 by telephone?

9 A. Correct.

10 Q. Do you have any record of your
11 calls?

12 A. I do.

13 Q. What do you have?

14 A. My reports. The documents that I
15 submitted and the reports that were submitted are
16 direct results of my conversations with Experian.

17 Q. The writing that appears on the
18 reports that you produced?

19 A. As well as the reports themselves.

20 Q. Have you made no other type of
21 record of your calls?

22 A. What is in my complaint and what is
23 in the documents that I produced and the reports
24 themselves.

25 Q. Did you make any notes?

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2 A. On the reports, yes.

3 Q. Any notes other than what you
4 produced in this pile marked Exhibit 10?

5 A. I'm sorry?

6 Q. Have you made any notes regarding
7 calls with Experian other than those contained
8 this Exhibit 10?9 A. Along with the complaint and any
10 documents that I produced, those are the results
11 of conversations as well as credit reports received.12 Q. I'm just referring to notes. Have
13 you made any notes regarding your calls with
14 Experian?

15 A. Yes.

16 Q. Where are the notes?

17 A. On my credit reports and the
18 documents that I submitted.19 Q. Have you any notes regarding calls
20 other than those that appear on the documents that
21 you submitted?22 A. No, because I haven't spoke to
23 Experian since, I forget what date it was, but I
24 did call Experian to dispute something and they
25 told me to call Experian's counsel, that was prior

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2 (Witness reviewing document.)

3 Q. Does this appear to be your credit
4 disclosure?

5 A. Yes, I do recognize this
6 information, yes.

7 Q. Turn to page three, do you see ID
8 fraud victim alert on your credit file?

9 A. On page three this is Experian's
10 statement.

11 Q. It indicates that you have an ID
12 fraud victim alert on your file?

13 A. That is what it says here.

14 Q. What is your understanding of such
15 an alert?

16 A. I have no understanding because as
17 far as I'm concerned it is incoherent and not the
18 statement that I requested. I don't know why
19 Experian continues to maintain this statement.

20 Q. You understand there is a fraud
21 victim alert on your file?

22 A. If that is what you're telling me.

23 Q. Do you understand what it means to
24 have an ID fraud victim alert on your credit file?

25 A. No.

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2 Q. You see your credit file is frozen?

3 A. That is what it says.

4 Q. What is your understanding of a
5 freeze?6 A. My understanding of a freeze, the
7 only entities that would have access to my credit
8 reports would be existing creditors and -- existing
9 creditors. Otherwise my permission is needed for
10 someone to pull my report.11 Q. Take a moment to review the
12 document. Do you contend that anything in this
13 current disclosure is inaccurate?

14 A. Yes.

15 Q. Direct me to each item?

16 A. Page 13, address.

17 Q. Which address?

18 A. 4358 Edison Avenue.

19 Q. Do you recognize that address?

20 A. I do not.

21 Q. Have you ever had an account with
22 that address?

23 A. No.

24 Q. Anything else.

25 (Witness reviewing document.)

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2 MR. MALLON: I'm going to object to
3 the extent that you're asking her to look at
4 this entire report. I don't know if we have
5 time, but she can try to answer the question
6 to the best of her ability right now.

7 Q. Take the time that you need, Miss
8 Jones.

9 (Witness reviewing document.)

10 A. Telephone number, page 14.

11 Q. Do you recognize the number?

12 A. That is not my phone number.

13 Q. Do you recognize the number?

14 A. That is not my phone number.

15 Q. My question, Miss Jones, is if you
16 recognize the number.

17 A. It is not my phone number, no, I
18 don't recognize it.

19 Q. My question is just whether you
20 recognize it.

21 A. I do not recognize the phone
22 number. That does not belong to me.

23 Q. Does it belong to your mother?

24 A. No.

25 Q. What is your mother's number?

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2 A. Why do you need my mother's phone
3 number. .4 Q. Is that the number of the house in
5 which you currently live?

6 A. I use a mobile phone number.

7 Q. What is your mother's phone number
8 to the house located at --9 A. My mother uses a mobile phone
10 number.11 Q. Is there any phone line to that
12 house?13 A. There is for the Internet, I
14 believe. It is for the Internet.15 Q. What is the telephone number to the
16 residence at 915 East 178th Street?

17 A. That is not my address.

18 Q. Sorry. You currently live at 154th
19 Street?

20 A. Correct.

21 Q. What is the phone number of that
22 home?23 A. I don't even call it. I have to
24 look in my phone book. I don't call my mother on
25 her home phone. So I have to look it up and get

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2 back to you.

3 Q. Do you know what it starts with?

4 A. 718, because it is Queens.

5 MR. MALLON: But it is not the number
6 on page 14?7 THE WITNESS: Absolutely not. I
8 don't know whose phone number that is. It
9 isn't anybody that I know.10 Q. You wouldn't know one way or the
11 other if that is your mother's number if you don't
12 know your mother's number, right?13 A. That is not my mother's number. I
14 could tell you that.15 Q. Do you have your mother's number in
16 your mobile phone?

17 A. I do not. It is at home.

18 Q. There is no way with what you have
19 here you can identify your mother's number?

20 A. I'm sorry?

21 Q. From what you have with you here
22 today, can you identify your mother's phone
23 number?24 A. I don't call my mother at home. I
25 don't have my mother's phone number.

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2 Q. Is there anything else in this
3 disclosure statement identified as Exhibit 13 that
4 you contend is inaccurate?

5 MR. MALLON: Same objection.

6 A. On page three it says up top,
7 "Personal statement you have asked us to include.
8 You have given us the following statement to
9 include every time a company asks us for your
10 credit report." That is absolutely false.

11 Q. Why do you contend that it is
12 false?

13 A. I have never given that statement
14 and it is an incoherent statement, and I have been
15 disputing that statement consistent, which we have
16 documented here. This is an Experian statement.
17 This is not anything that I have given to Experian
18 in writing.

19 Q. What is the statement that you have
20 given to Experian to include here?

21 A. If we go back to Exhibit 11, Jones
22 11, Experian 005 is one dated January, 2011.

23 Q. The question, Miss Jones, what is
24 the statement you wanted to have included here on
25 page three of your disclosure statement?

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2 A. I'm directing you to two of several
3 requests. So if you look at Experian 005 dated
4 January, 2011 that is one of at least two. And
5 the second one is Experian 0013 dated
6 December 20th, 2011. And I believe that repeats
7 in what was printed off for today.

8 Q. What I would like you to testify to
9 today Miss Jones is what you have asked Experian
10 to include as your personal statement.

11 MR. MALLON: She just answered the
12 question.

13 MR. STRAZZERI: She directed me to
14 some document and I would like her to
15 testify --

16 MR. MALLON: She answered the
17 question by showing you the document where
18 she asked for that.

19 A. In writing --.

20 Q. Just state for the record here what
21 you have asked Experian to indicate as your
22 personal statement.

23 A. Most recently in the year 2011 the
24 first statement and I will read it verbatim. It
25 is Experian 005 and it's quoted here. "I'm a

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2 victim of identity theft both financial and
3 medical. Please be advised that all questions
4 should be directed to me in writing by U.S. mail
5 only at the address of record in New York (P.O.
6 Box)." End of statement.

7 Q. That is the statement that you
8 wanted Experian to include in January of 2011?

9 A. Correct.

10 Q. Now, you also directed me to
11 another consumer statement that you asked to have
12 included on Experian 13?

13 A. Correct.

14 Q. What is the statement that you
15 wanted Experian to include?

16 A. When the first -- the January
17 statement wasn't added then I wrote again and
18 asked again on December 20th. "You are on notice
19 that my credit reports contain false, inaccurate
20 and fraudulent information. All correspondence
21 must be sent to my only address of record at P.O.
22 Box 634, Bronx, New York 10451. Legal action will
23 commence to correct the record."

24 Q. Those are the statements that you
25 wanted Experian to include?

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2 A. Those are two -- yes, those are the
3 two.

4 Q. Are there others?

5 A. There was a previous one several
6 years ago, but I can't find the letter that I
7 sent. Only Trans Union put it on there and it
8 remains on there to this day.9 Q. You have asked them to include a
10 different statement then?

11 A. I'm sorry?

12 Q. There are different statements that
13 you asked Experian to include?14 A. These are the statements that I'm
15 asking for Experian to include. The previous
16 statement before all of these was the one that
17 actually appears on my Trans Union credit report.
18 I don't have that letter.19 Q. I'm trying to understand. Do you
20 want all three statements included or you're
21 saying include this one and then other times
22 you're saying include a different one?23 A. What I'm saying is I mailed the
24 letter as you could see here to Experian in
25 January of 2011 requesting my 100-word consumer

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2 statement, which I'm entitled to. When Experian
3 did not do that, I wrote again on December, 2011
4 and requested that my 100-word consumer statement
5 be added.

6 Q. A different one?

7 A. A different one from January
8 because it was 11-months later. Here we sit
9 January 4th and I still don't have my consumer
10 statement.

11 Q. Since the first time that you have
12 asked Experian to include a consumer statement,
13 they've indicated in your file, "ID fraud victim
14 alert. Applications may be submitted in my name
15 or my identity may have been use without my
16 consent to fraudulently obtain goods and services.
17 Do not extend my credit without first contacting
18 me personally and verifying all applications
19 information a day or evening. This victim alert
20 will be maintained for several years beginning...
21 All correspondence should be sent to me at P.O.
22 Box 634 Bronx, New York 10451." Do you see that?

23 A. I see that.

24 Q. That statement has been included in
25 your files since you have asked for a personal

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2 statement?

3 A. That is not the statement. Because
4 my letter specifically states that I wanted my
5 100-word consumer statement on there verbatim.
6 However, if I am not understanding that I'm not
7 entitled to a 100-word consumer statement
8 verbatim, that was not clear to me. Experian
9 never sent me anything saying, hey, we are
10 summarizing what you said. You can't have it
11 verbatim. As far as I'm concerned I'm entitled to
12 a 100 word statement verbatim. This is not
13 verbatim.

14 Q. This is a summary?

15 A. This is Experian's statement. This
16 is not my statement.

17 Q. Since first requesting that a
18 consumer personal statement be included, has that
19 Experian statement been in your file?

20 A. This is the statement that I have
21 seen.

22 Q. That has been in place since you
23 asked for a consumer statement?

24 A. I don't know what was in place back
25 in '04/'05 because as I said, Trans Union is the

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2 only CRA that has put the original statement that
3 I originally sent regarding my whole fraud
4 situation that remains today.

5 Q. I understand that the statement
6 that appears in your file is not the one that you --
7 verbatim of what you wanted. My question is only
8 that when you asked for a consumer statement they
9 put this statement in or a statement in?

10 A. But this is incorrect.

11 MR. MALLON: He is not asking if it
12 is correct. I think the question is do you
13 think they put this in in response to your
14 request.

15 Q. When you requested the personal
16 statement, was this statement added indicating
17 that you're a victim of identity theft?

18 A. This statement was there before
19 these two letters.

20 Q. Since notifying Experian that your
21 identity was stolen, have they included a statement
22 that you're the victim of identity theft, a fraud
23 victim alert?

24 A. I have to go back and look and see
25 how far back this goes. I would have to see --

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2 Q. My question is, are you contending
3 in this lawsuit that Experian put a different
4 statement than the one that you have asked for
5 verbatim or is your complaint that they didn't put
6 a statement regarding your status as a fraud
7 victim?

8 A. They did not put my 100-word
9 consumer statement as I have it written.

10 Q. But they put a statement, it just
11 wasn't the one that you wanted?

12 A. They put some statement here, but
13 it is their own statement. It is not my
14 statement.

15 Q. And it informs the reader that
16 you're the victim of identity theft?

17 MR. MALLON: Objection, it speaks for
18 itself.

19 A. This statement that Experian has on
20 here says applications may be submitted or my
21 identity may have been used. The fact is that
22 applications were submitted and the fact is my
23 identity has been stolen. So this statement that
24 Experian chose to put on here is not accurate.

25 In addition to it not being the

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2 100-word consumer statement that I submitted that
3 I was under the impression that should added
4 verbatim.

5 Q. But it was added when you asked for
6 a consumer statement; is that right?

7 A. It was there before. I don't know
8 when it appeared. I have to cull over the
9 documents again to see when this incoherent
10 statement popped up.

11 Q. Is there anything else in this
12 report or consumer disclosure that you contend is
13 inaccurate other than what you have identified?

14 A. So far as I'm concerned it is the
15 consumer statement on page three. I see my
16 student loans are here. So this section is
17 accounts in good standing, okay.

18 So if I'm reading this correctly
19 from page eight on these are accounts in good
20 standing and they all seem to be accurate.

21 From page 8 to 12 these are
22 accounts in good standing. Page 13 there is a
23 fraudulent address that still remains and there is
24 a fraudulent phone number here. And so I'm
25 dealing with pages three, four, five, six and

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2 seven. I recognize everything on here. Sometimes
3 I'm dealing with directly, but the only fraud that
4 I see or inaccuracy I have already identified.

5 I would also like to say for the
6 record on page eight, Long Island University. On
7 the right-hand side, your statement. That
8 statement has been there since 2001 and that was
9 my statement verbatim. So my expectation is
10 always that when I submit a statement it is
11 entered verbatim.

12 Q. The statement that appears on eight
13 is to your satisfaction?

14 A. That is my verbatim. That is what
15 I assumed would be done when I send in a request
16 for my statement to be added.

17 Q. Before I move on, to clarify the
18 inaccuracies that you allege are contained in the
19 January 4th, 2013 report are the telephone number,
20 the Edison Avenue, New York address and the
21 content of the consumer statement; is that right?

22 A. Correct.

23 Q. Is there anything else that you
24 allege is inaccurate in that report?

25 A. Not inaccurate. There are some

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2 things that I have to find out on my own, but I
3 recognize everything here.

4 Q. Are you alleging in this lawsuit
5 that anything else is inaccurate in this report?

6 A. In this report dated January 4th,
7 2013, that's it.

8 Q. We could put this aside.

9 Let's discuss the Central Financial
10 Control Defendant. Have you ever seen any entries
11 concerning Central Financial Control or CFC in
12 your Experian credit file?

13 A. Yes.

14 Q. When was the first time?

15 A. I think it goes as far as '08.
16 '08, '09. Somewhere in there. '08, '09, '10.

17 Q. What was your understanding why it
18 was there?

19 MR. MALLON: Objection.

20 A. I don't know why it was there
21 because it is not an account that I had. It
22 wasn't my account. It was fraud.

23 Q. Do you have any information at all
24 as to how it ended up in your file?

25 A. I have no idea how it got to my

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2 file. I know it is fraud.

3 Q. Do you have any reason to think
4 that it was associated with theft of your identity
5 in Philadelphia?

6 A. Yes, I believe it does stem from
7 the identity theft.

8 Q. What is the reason that you believe
9 that?

10 A. It appears eight years later that
11 everything seems to be concentrated in the
12 Philadelphia, Pennsylvania area from Commerce Bank
13 to the addresses that Comcast was delivering
14 service to, to the hospital, everything seems to
15 be concentrated there in Philadelphia,
16 Pennsylvania.

17 Q. Have you ever been treated at
18 Hahnemann University Hospital?

19 A. No, I have never been to a hospital
20 outside of New York.

21 Q. Have you ever received any document
22 or bills from Hahnemann University Hospital?

23 A. No.

24 Q. How about from CFC?

25 A. No.

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2 Q. And other reports as well?

3 A. If the notation is there. I don't
4 know if it may have fallen off in between reports.5 Q. They put this in after you disputed
6 those items?

7 A. I would assume so, yes.

8 Q. Has Experian told you to contact
9 CFC directly?

10 A. No.

11 (Jones Exhibit 15 for identification,
12 Copy of Miss Jones' credit disclosure dated
13 March 13th, 2011.)14 Q. Take a look at Exhibit 15. Miss
15 Jones is this a copy of your credit disclosure
16 date March 13th, 2011?

17 A. Yes.

18 Q. And you were sent this at your P.O.
19 Box in the Bronx?

20 A. Yes, P.O. Box 634.

21 Q. So you received this document?

22 A. Yes, I see this.

23 Q. You see on the first page there are
24 two notations regarding Central Financial Control?

25 A. Yes.

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2 Q. Did you receive this in response to
3 disputing those credit items?

4 A. Yes.

5 Q. It indicates that or instructs you
6 to contact Central Financial Control directly?

7 A. Yes.

8 Q. Did you do so?

9 A. Yes, but not at the direction of
10 Experian. I did that previously when I saw it in
11 '08 or '09 or whatever year it was, I contacted --
12 no, I didn't contact CFC. I contacted the
13 hospital.

14 Q. Did you ever contact CFC?

15 A. I don't recall contacting CFC.

16 Q. Did you ever inform CFC that that
17 was not your debt?18 A. I don't recall speaking to them,
19 but I consistently disputed it via my credit
20 report.

21 Q. Did you ever dispute it with CFC?

22 A. I don't recall disputing it with
23 them directly. I do recall going directly to the
24 hospital.

25 Q. When did you go directly to the

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2 hospital?

3 A. I called '08, '09, whenever I
4 discovered it. I don't know exactly what the year
5 is, but you know.

6 Q. Who did you speak with?

7 A. It is in my complaint. The
8 gentleman's name that I believe I spoke with is
9 Keith whatever his last name is.

10 Q. What did you tell him?

11 A. I explained to him that this is
12 fraud and I wanted to know what was happening. If
13 they are claiming this is my information they need
14 to send it to me and obviously they didn't.

15 Q. Did you tell him anything else?

16 A. I just explained that it was fraud
17 and that I have disputed it and that was pretty
18 much the extent of the conversation. And I made a
19 phone call to medical records and that is how I
20 found out that the DOB didn't match.

21 Q. What is medical records?

22 A. Medical records at Hahnemann
23 University Hospital.

24 Q. What did you do next?

25 A. I'm sorry?

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2 A. No.

3 Q. Do you know which social security
4 number they had on your account?5 A. I don't know that they did have a
6 Social Security Number, I don't know.7 Q. You don't know one way or the
8 other?

9 A. I don't know.

10 Q. Did you learn about any other
11 information that they had in your file?12 A. The medical records that they have
13 there at the hospital has my name and a different
14 birthday and a Philadelphia address. I don't know
15 about the social.16 Q. Do you know any information about
17 the treatment the hospital gave?18 A. I would have no way of knowing
19 that. That is private information.

20 Q. They didn't give you that?

21 A. No.

22 Q. Did you have any other
23 correspondence or written or oral with Hahnemann
24 University Hospital other than that?

25 A. I think that was -- I recall that

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2 was the extent of it. When I didn't get a letter
3 back, I just, as I said, I consistently disputed
4 it with -- consistently disputed it on my credit
5 report.

6 Q. Did you ever have any written or
7 oral communication with CFC?

8 A. I don't recall speaking to CFC
9 directly.

10 Q. Did you ever give Experian any
11 document from the hospital or CFC indicating that
12 you weren't responsible for the debt?

13 A. I never received anything from the
14 hospital.

15 Q. So you never gave anything to
16 Experian from the hospital or from CFC?

17 A. There was nothing to give.

18 Q. Why did you bring your lawsuit
19 against CFC and Hahnemann University Hospital?

20 A. Those were the two that were on my
21 credit report and since I am not an attorney, I
22 figured cast my net wide and see what happens.

23 Q. What do you mean by that?

24 A. Meaning as far as I was concerned
25 the hospital hired CFC to collect on a fraudulent

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2 debt, so I need to bring them both to the table to
3 get this straightened out, especially since I knew
4 the DOB and address didn't match.

5 Q. Why do you contend they were
6 responsible for a debt that was fraudulently or
7 account that was fraudulently opened in your name?

8 MR. MALLON: Objection to form. She
9 is not alleging they are responsible. She is
10 saying she wasn't responsible.

11 A. Those are the entities that I need
12 to deal with to get it off.

13 Q. Do you think they were responsible
14 for why it appeared in your credit file?

15 MR. MALLON: Objection to form.

16 A. I don't know who is responsible,
17 all I know is that it is fraud and it needs to come
18 off.

19 Q. Who perpetrated the fraud?

20 MR. MALLON: Objection to form.

21 A. An identity thief.

22 Q. The reason why there is a -- there
23 was a CFC or Hahnemann entry in your file is
24 because of an identity theft?

25 MR. MALLON: Objection to form.

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2 A. Correct. Someone used my
3 information and went to the hospital. Or I'm
4 assuming. I don't know about the social. That I
5 have yet to confirm.

6 Q. Someone used your name and
7 information to pay for services from the hospital,
8 is that your understanding?

9 MR. MALLON: Objection to form.

10 A. My understanding someone used my
11 name. I have not been able to confirm that the
12 hospital actually has my social security number.

13 Q. And you settled with the hospital
14 and CFC in this lawsuit?

15 A. Correct.

16 Q. How much did you receive from that
17 settlement?

18 MR. MALLON: Objection. I instruct
19 her not to answer. It is a confidential
20 settlement. Don't answer the question.

21 Q. Did you receive money from CFC and
22 Hahnemann University Hospital?

23 MR. MALLON: Objection, same
24 objection. It's confidential. Don't answer
25 the question.

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2 Q. They are no longer a party to the
3 lawsuit; is that right?

4 MR. MALLON: Objection to form.

5 Q. Do you know if they are still a
6 part to the lawsuit or not?

7 A. I don't know. I haven't seen -- I
8 don't know what -- it there have been documents
9 that have been signed to officially dismiss them.

10 Q. You're dismissing them from this
11 action?

12 A. We have settled and I believe there
13 is some paperwork that needs to be done.

14 Q. Let's discuss Comcast Cable. Have
15 you ever seen any interests concerning Comcast
16 Cable in your Experian credit file?

17 MR. MALLON: Objection to form.

18 A. I'm sorry?

19 Q. Have you seen any entries
20 concerning Comcast Cable in your Experian credit
21 file?

22 A. Yes.

23 Q. When was the first time?

24 A. I don't remember the first time.

25 It is probably like 2010. Somewhere thereabouts.

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2 Q. How many times did you see an entry
3 regarding Comcast Cable in your credit file?4 A. Whenever I discovered it, it was on
5 there up until today when I looked at this report.6 Q. How many times did you see it in
7 there?8 A. Every time I have seen the report
9 from when I discovered it up until today.10 Q. How many times would you estimate
11 you have seen that?

12 A. Minimum of five.

13 Q. What is your understanding as to
14 why that account was there?

15 MR. MALLON: Objection to form.

16 A. It is fraud. It is on my credit
17 report and it was fraudulent. It was opened
18 fraudulently by someone in the Philadelphia area.

19 Q. How did you come to believe that?

20 A. It was on my credit report.

21 Q. Is there any other basis for
22 believing it was fraudulent?23 A. I didn't open any accounts in
24 Pennsylvania.

25 Q. Do you have any other information?

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2 A. Other than my credit report?

3 Q. Yes.

4 A. I'm sorry, what are you asking?

5 Q. I'm trying to understand all the
6 information and knowledge you have concerning the
7 Comcast Cable entry in your Experian credit file.8 A. I have no business with Comcast
9 Cable.10 Q. Do you have any information
11 regarding that account that is in your name?12 MR. MALLON: Objection to form, asked
13 and answered.14 A. No more than what is on the credit
15 reports.16 Q. Do you know anything about that
17 account?

18 A. I don't.

19 MR. MALLON: Objection.

20 Q. Do you know a name or information
21 that it is associated with?

22 MR. MALLON: Same objection.

23 A. I have received no documentation
24 from Comcast.

25 Q. What is your -- have you ever had

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2 after receiving -- after making your dispute?

3 A. I did receive it after making the
4 dispute.

5 Q. This document states that the
6 credit grantor requests you to contact them
7 directly; is that right?

8 A. This document does request that I
9 contact the Comcast directly and this is dated
10 December 9th, 2011 and my correspondence was
11 before then. So I didn't need Experian to tell me
12 to contact Comcast. I just did it.

13 Q. Did you ever contact Comcast after
14 December 9th, 2011?

15 A. So my letters to Comcast, one is
16 dated November 19, 2011. And another is dated,
17 yes, December 20th which clearly states that I'm
18 fed up. So, yes.

19 Q. Did you have any communication
20 with Experian regarding the Comcast account after
21 receiving this report from them dated December 9th?

22 A. I received several reports in the
23 month of December, I believe. I have to go back
24 and look at them to see what the nature is because
25 I received random stuff in the mail from Experian

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2 that I don't even know what it was.

3 So I'm not certain that I did
4 additional disputes beyond December 9th. I have
5 to look at those documents again.6 Q. Do you have any recollection of
7 disputing a Comcast account after December 9th,
8 2011?

9 A. I recall I did.

10 Q. Did you receive any response from
11 Experian?12 A. I received a few reports in
13 December from Experian. Excuse me, reports and
14 information. I don't believe everything was a
15 full *arm report.16 Q. Did you ever provide any
17 information to Experian regarding Comcast?

18 A. Other than my dispute?

19 Q. Did you ever provide any documents
20 to Experian regarding the Comcast entry?

21 A. I did not.

22 Q. Did you ever provide them with any
23 of the correspondence that you had with Comcast?

24 A. I did not.

25 Q. Did you ever provide Experian with

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2 any fraud affidavit or police report that your
3 Comcast account was a result of identity theft?

4 A. I have one police report from 2005.

5 Q. That is the only one that you
6 contend that you sent to Experian?

7 A. That's correct.

8 Q. This account didn't appear until
9 sometime around 2010?

10 A. Somewhere thereabouts, '8, '9, '10.

11 Q. You never sent Experian a copy of
12 the police report after you discovered CFC or the
13 Comcast accounts on your credit file?14 A. It is my understanding once you
15 file a police report regarding identity theft it
16 is one police report. You do not file a police
17 report for every instance of fraud.18 Q. You were asked over the years by
19 Experian to send them a copy of the police report?

20 A. No.

21 (Jones Exhibit 17 for identification,
22 Credit disclosure for Miss Jones dated
23 June 18th, 2004.)24 Q. Look at the exhibit marked Jones
25 Exhibit 17. Is this your name and address on this

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2 document?

3 A. Yes, it is.

4 Q. It appears to be your credit
5 disclosure dated June 18th, 2004?

6 A. Yes.

7 Q. Do you recognize the accounts?

8 A. Yes.

9 Q. Now, the first page indicates that
10 at your request an initial security alert be
11 placed on your file?

12 A. Correct.

13 Q. Why did you ask for an initial
14 security alert in June, 2004?

15 A. Because at the time where I was
16 working there was conversation about someone in HR
17 in the mailroom doing -- allegedly accessing
18 employee information, and so since I didn't know
19 what that was about, I said well, I don't know
20 what is happening, I don't have any facts, but at
21 least I can put a fraud alert on there just to be
22 safe.

23 Q. So you had no information that your
24 identity had been stolen?

25 A. No, it was a situation in the place

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2 that I was working where there was something going
3 on with HR.

4 Q. Was this the first time that they
5 added a security alert to your file?

6 A. I don't know.

7 Q. You don't recall?

8 A. I'm sorry?

9 Q. Was that the first time in June,
10 2004 that you had added a security alert to your
11 credit file?

12 A. I don't know. That instance goes
13 back a couple of years, so I don't know.

14 Q. You have added security alerts and
15 freezes to your Experian file since at least 2004?

16 A. No. There was no such thing as a
17 security freeze in 2004.

18 Q. You added a security alert?

19 A. Fraud alert. Is that the same as a
20 security alert?

21 Q. What do you understand what was
22 placed in June, 2004 on your account?

23 A. I know of a fraud alert which is
24 90 days and also looking at page 17 apparently the
25 identity theft started early in 2004. So it did

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2 start sooner but I didn't know it was an identity
3 theft because there is a Philadelphia address on
4 here. Experian Bates stamp 500.

5 Q. Let's put that aside.

6 MR. STRAZZERI: Mark this as 18
7 (Jones Exhibit 18 for identification,
8 Complaint.)9 Q. Let's talk about the lawsuit, Miss
10 Jones. Why have you brought a lawsuit against
11 Experian?12 A. Because there has consistently been
13 fraud on my reports that I have not been able to
14 get off my reports. So my reports are inaccurate.15 Q. So what do you contend that
16 Experian did wrong?

17 A. It didn't investigate properly.

18 Q. How so?

19 A. Clearly the hospital is a clear
20 example. The DOB didn't match, the address didn't
21 match and the name matched and I don't know about
22 the social security number. So I have never
23 disputed my personal information with Experian.
24 My name and my social and my DOB as far as I knew
25 was accurate.

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2 If those things are accurate on my
3 Experian credit report, how is that your client
4 comes in Keisha Jones born on some different day
5 who lives in a different state, this is her account when
6 my information doesn't match up.

7 Q. Do you understand that not all the
8 information has to match up for an item to be
9 included in a consumer's credit file?

10 MR. MALLON: Objection to form.

11 A. No, I don't understand that. That
12 makes no sense to me.

13 Q. If someone were to not put the
14 correct birth date on an account, that account
15 shouldn't be included in the credit file?

16 MR. MALLON: Objection, form.

17 A. Say that again.

18 Q. If someone were to put a different
19 birth date on their credit account, you believe it
20 shouldn't be included in the credit file any
21 longer?

22 MR. MALLON: Objection to form. I
23 think we are running low on time, are you
24 going to debate with her what the FCR means
25 or are we going to allow Comcast time to ask

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2 questions?

3 Q. Do you have an answer?

4 A. I don't understand the question.

5 Q. Why did you sue Equifax?

6 A. The same issue, fraud, inability to
7 access my credit reports.8 Q. Let me go back to Experian. You
9 said action against Experian because it didn't
10 investigate properly; is that right?

11 A. Fraud, correct.

12 Q. What do you mean fraud?

13 A. There is fraud on my credit reports
14 and I haven't been able to get it off via what I
15 thought was normal channels. You dispute it and
16 they investigate and then they determine if the
17 information is correct or incorrect and it
18 consistently came back as being correct. I don't
19 understand how that can be so when the DOB and the
20 address don't match and Experian new or should
21 have known that I'm a victim of identity theft
22 because it has been clear all along.23 Q. When you say they determine if the
24 information is correct or not correct, who are you
25 referring to?

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2 A. Experian and its client.

3 Q. Its client meaning?

4 A. Whomever your client is in this
5 case. It could be Comcast, CFC, the hospital.6 Q. So your understanding is that CFC
7 and the hospital are clients of Experian?

8 A. I believe so.

9 Q. Let's take a look at the complaint.
10 Is your allegation -- was your allegation against
11 Trans Union any different than from Equifax and
12 Experian?

13 A. They are similar.

14 Q. That is they were reporting entries
15 that you contend are fraudulent?

16 A. Correct.

17 Q. Take a look at the complaint which
18 is marked as Exhibit 18. Turn to paragraph 52,
19 which introduces a section regarding Experian. It
20 is in the section describing Experian.21 Miss Jones describe your allegation
22 in paragraph 52 that Experian does not investigate
23 disputes or frauds?24 A. It is my belief they do not. Again
25 using the hospital as a classic -- as the example.

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2 Q. What information do you have with
3 respect to whether or not Experian ever conducted
4 an investigation with CFC or the hospital?

5 A. Consistently reporting the fraud on
6 my credit report and verifying it as being true
7 and correct.

8 Q. But if CFC indicated to them that
9 it was accurate, would you consider that to be an
10 investigation?

11 A. No.

12 Q. What do you contend Experian should
13 have done to investigate that CFC and the
14 Hahnemann account other than check with the
15 hospital or CFC?

16 MR. MALLON: Objection to form.

17 A. I don't know what is supposed to
18 happen, but in the real world with normal people,
19 if I say that, you know, this microphone belongs
20 to me, and someone says no, the microphone belongs
21 to me, I'm going to say, well, what do you have to
22 show that the microphone belongs to you.

23 Q. Take a look at paragraph 53, you
24 called Experian to initiate a dispute in November
25 of 2011?

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2 A. Correct.

3 Q. What did you dispute? What dispute
4 are you describing here?5 A. I started out by trying to dispute
6 fraudulent addresses.7 Q. And they requested during this call
8 on November 10, 2011 a police report?9 A. They asked me did I file a police
10 report regarding that fraudulent address.11 Q. They also asked you to submit the
12 police report to Experian, right?13 A. No. They asked me to go -- did I
14 file and send them a police report for this
15 particular incident. The conversation was based
16 on what you're disputing, did you file a police
17 report about this. I said I don't have -- I don't
18 have to file a police report every time something
19 happens. The rep was insisting that every time
20 something happens, I have to file a police report.21 Q. During this call did they ask you
22 for a copy of the police report?23 A. I don't recall them asking me for
24 that. They asked me to file a police report based
25 on what I was disputing at that point in time.

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2 Q. Describe your allegations in
3 paragraph 55?4 MR. MALLON: Objection to form. The
5 allegations speak for themselves in
6 paragraph 55. You can answer.

7 (Witness reviewing document.)

8 Q. What are you alleging Experian did
9 wrong here?10 A. I was trying to get the contact
11 information -- accurate contact information for
12 CFC.

13 Q. And --

14 A. And the rep told me to just Google
15 it.16 Q. You felt that Experian should have
17 provided you with that address?18 A. It was my understanding that they
19 are supposed to, correct, yes.20 Q. And you screamed at the Experian
21 representatives?22 A. I did. I was quite upset and I did
23 raise my voice, not intentionally to be
24 adversarial, but I was upset. The reason that I
25 did that because I'm trying to -- back to Jones

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2 MR. STRAZZERI: That is not what it
3 says there.

4 Q. Are you basing your contention that
5 your credit report was disseminated to a
6 third-party solely on this section or that page of
7 your Experian credit disclosure?

8 A. Correct. Because it says record of
9 requests for your credit history.

10 Q. Do you have any information or
11 knowledge indicating that your credit report was
12 disclosed to any third-party other than what
13 you're saying that one page shows?

14 A. I have to go back and look through
15 them all once again.

16 Q. Other than what appears in your
17 credit disclosures, do you have any knowledge or
18 information that your credit report was
19 disseminated to a third-party?

20 A. Other than my credit report you're
21 saying?

22 Q. Other than the disclosures that you
23 received of from Experian, do you have any
24 information indicating that a third-party has
25 received a copy of your Experian credit report?

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2 A. I'm basing it on my credit --

3 MR. MALLON: He is asking you other

4 than that.

5 A. Not other than my credit report,

6 no.

7 Q. Have you applied for credit in the
8 last seven years?9 A. I have not applied for credit since
10 my security freeze has been in place since 2006.11 Q. Have you submitted any other
12 applications such as a job application or
13 insurance application that required that entity to
14 review your Experian credit report?

15 A. Yes.

16 Q. Who?

17 A. December 14th I gave written
18 authorization for the FBI and the Department of
19 Homeland Security.

20 Q. Department 14, 2012?

21 A. Yes.

22 Q. Anyone else?

23 A. Sorry, December 17th.

24 Q. Have you submitted any other
25 applications such as a job application or

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2 insurance application or housing application that
3 enabled the entity to access your Experian credit
4 report?

5 A. The only access or permission I
6 have given since the freeze has been on in
7 December 6th is December 17th, 2011 to the FBI.

8 MR. KARAMOUZIS: '12.

9 A. Yes, December 17th, 2012 to the
10 FBI, Department of Homeland Security.

11 Q. Other than looking at those
12 disclosures, do you have any reason to believe
13 that any third-party has reviewed or seen a copy
14 of your Experian credit disclosure?

15 A. Other than this information here?

16 Q. Yes.

17 A. Not that I know of.

18 Q. Have you authorized anyone to
19 review your file?

20 A. Only the December 17th, 2012.

21 Q. Let's look at paragraph 60 of your
22 complaint. You allege here that Experian has not
23 maintained a permanent security freeze. What is
24 your basis for that allegation?

25 A. That is a -- 60. If I go back to

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2 the December 30th report which is Jones
3 Exhibit 19, I am not sure if this is the report or
4 another one. I did receive correspondence from
5 Experian. Let me just -- the basis for that, I'm
6 looking at Jones Exhibit 10.

7 Q. Those are documents that you
8 produced to Experian?

9 A. Correct.

10 Q. Go ahead.

11 A. And that would be toward the back.

12 It is page 1 of 24 and this is the first page of
13 the report dated December 4th and I have it
14 labeled paragraph 60. I tried to be organized and
15 behind that it is page 1 of 2. The first page,
16 December 22nd -- the last four -- three pages or
17 four pages of that package. The last three.

18 Q. Starting with the December 4th --

19 A. Right, it says up top paragraph 60.

20 Q. Do you have any reason to believe
21 that a security alert was not on your account at
22 that time?

23 A. Based on these documents when I
24 received them in the mail unsolicited I didn't
25 know why I was receiving them. And why would a